



TALBOT Industries, Inc.

1211 Harmony St., P.O. Box 608, Neosho, Missouri 64850, 417-451-5900

MAR 21 1983

March 18, 1983

WASTE
MANAGEMENT PROGRAM

David Bedan, PhD
Director, Waste Management Program
Missouri Department of Natural Resources
P.O. Box 1368
Jefferson City, MO 65102

CERTIFIED MAIL

Dear Dr. Bedan:

Talbot Industries, Inc. previously hauled spent pickling liquor to disposal in Oklahoma.

Since last year, spent pickling liquor hauling to Oklahoma has ceased, as Talbot Industries blends the spent acid with a lime water waste stream. The resulting effluent has been reviewed by Frank Dolan, MDNR and Bert McCullough, Springfield Regional Office, MDNR. This effluent is not considered a hazardous waste and the Springfield Department of Natural Resources office has in their Hazardous Waste Compliance Inspection report of November 18, 1982, recommended petitioning to remove Talbot Industries from the Hazardous Waste System. Copies of Mr. Dolan's letter of September 22, 1982, and the Compliance Inspection Report are enclosed, as is my letter to Carol Eighmey, December 9, 1982, requesting Talbot Industries be removed from the list of Hazardous Waste Generators.

Subsequent correspondence from the state took no notice of these efforts. In each case we notified the referenced official. We have received Mrs. Treva Hearne's letter of March 11, 1983, and we then contacted Mrs. Hearne's office.

We were advised by Mr. Wilson, co-counsel with Mrs. Treva J. Hearne, by phone call today, that there are currently numerous misunderstandings with many industries in this effort. We hope this letter will clear up the matter.

Would you please review this situation for us and furnish, in writing, a statement that Talbot Industries is no longer on the list of Hazardous Waste Generators. If you have any questions please contact the writer.

We thank you in advance for your cooperation.

Sincerely,

Alex Bourne
Vice President - Engineering

AB:mc

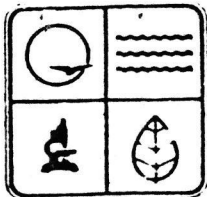
Enclosures

cc: Treva J. Hearne, with enclosures (Certified Mail)
Frank Dolan, MDNR, Jefferson City, MO
John R. Nixon, P.E. MDNR, Springfield, MO
Paul Trentham, P.E. AMA, Joplin, MO



R00354320

RCRA RECORDS CENTER



MISSOURI DEPARTMENT OF NATURAL RESOURCES
P.O. Box 1368 2010 Missouri Blvd. Jefferson City, Missouri 65102 (314) 751-3241

1.110 City of Neosho
MO-0029926

September 22, 1982

Mr. Jim Cole
Superintendent of Public Works
221 North College
Neosho, MO 64850

Dear Mr. Cole:

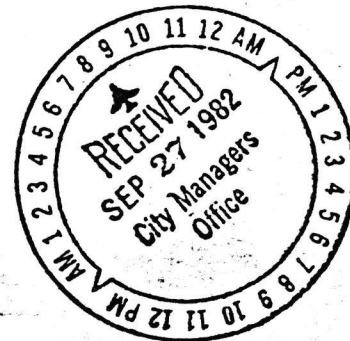
You have been working with an industry in your town Talbot General Wire Products to take certain materials that they previously disposed of by hauling to hazardous waste disposal sites. The materials contain acids, such as sulfuric acid and dissolved metal, particularly iron. We discussed in the past the use of this dissolved iron as a coagulant aid in your wastewater treatment plant. Ferrous Sulfate, dissolved form of iron, is used in water treatment plants as a coagulation aid in settling large suspended particles from the water.

Paul Trentham of Allgeier Martin and Associates consultant for Talbot Wire Products wrote me about investigations on adding this material to the sewer. He reports that the waste from Talbot does not have a low pH due to the acid as we had expected but instead has a high pH. The high pH comes from a lime dip operation at the Rod Plant. The lime is used to neutralize the acid used on the metal rod.

This investigation shows that not only will the acid waste be beneficial for your sewer system but will help solve the high pH problem you have been having at Talbot. You will change the nature of your discharge by accepting waste from Talbot and need to keep us informed of how well this disposal procedure is operating. Federal Regulations require that a report on industrial waste being treated by Publicly Owned Treatment Works such as your treatment plant be monitored at least once a month. This appears in a Federal Register of January 28, 1981, 40 CFR 403.12 I.

Monitoring reports should include information on iron, sulphates, and pH. The Federal Regulations requires a control of pH. Your standards of 6-9 fall within the standards set by the Federal Regulations. Attached is the additional monitoring requirements to be included with your NPDES monitoring of your wastewater treatment plant.

By notification of this letter, your permit will be modified to include these parameters. Other agencies being notified by copy of this letter include the Environmental Protection Agency and the Springfield Regional Office. Should you have any questions about the additional requirements please give me a call.



Christopher S. Bond Governor
Fred A. Lafser Director

Division of Environmental Quality
Robert J. Schreiber Jr., P.E. Director

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

The permittee is authorized to discharge from outfall(s) with serial number(s) as specified in the application for this permit. The final effluent limitations shall become effective upon issuance and remain in effect until expiration of the permit. Such discharges shall be controlled, limited, and monitored by the permittee as specified below:

Outfall Number and Effluent Parameter(s) Units of Measurement	EFFLUENT LIMITATIONS			MONITORING REQUIREMENTS	
	Daily Maximum	Weekly Average	Monthly Average	Measurement Frequency	Sample Type
		mg/l	mg/l		
<u>Outfall #001 (additional monitoring)</u>					
Iron		*	*	once/month	24 hr. comp.
Sulfates		*	*	once/month	24 hr. comp.
<u>Industrial Monitoring</u>					
Iron		*	*	once/month	24 hr. comp.
Sulfates		*	*	once/month	24 hr. comp.
pH Units		*	*	once/month	grab
*Monitoring Requirement only					

Monitoring reports shall be submitted ; the first report is due

There shall be no discharge of floating solids or visible foam in other than trace amounts.

B. STANDARD CONDITIONS

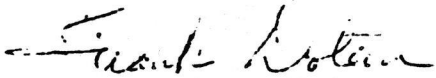
In addition to specified conditions stated herein, this permit is subject to the attached standard conditions dated , and hereby incorporated as though fully set forth herein.

C. SCHEDULE OF COMPLIANCE

Mr. Jim Cole
Page 2
September 22, 1982

Thank you for your efforts in the additional load taken on by the plant. I believe it will be beneficial to both the city and the industry.

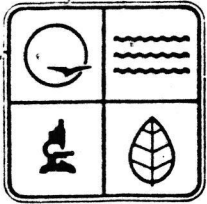
Sincerely,



Frank Dolan
Environmental Engineer
Water Pollution Control Program

FD/ji

cc: Joe Davis, Waste Management Program
Greg Perkins, Springfield Regional Office
Lee Duvall, Environmental Protection Agency



MISSOURI DEPARTMENT OF NATURAL RESOURCES

P.O. Box 1368 1915 Southridge Drive Jefferson City, Missouri 65102 (314) 751-3241

Dear Generator:

The Missouri Department of Natural Resources finds it necessary to again ask for your cooperation in providing information related to your registration as a hazardous waste generator. In an effort to keep paperwork requirements to a minimum, we are attempting to accomplish several things with this single effort:

1. The Missouri registration data must incorporate U.S. EPA generator ID numbers and waste ID numbers. As you know, the department is trying to obtain authorization from the federal EPA to be solely responsible for the Hazardous Waste Management Program in Missouri. This authorization will avoid duplication of efforts by the state and federal agency. Changes in federal regulations which have occurred since Missouri first published state regulations in January, 1980, have necessitated parallel changes in state requirements, and prompt this request.
2. Much of the data received during initial registration in early 1980 is now outdated. Due to changes in regulations, changes in manufacturing processes, and so forth, our current computer file of generator registration is not completely accurate. This request will rectify that situation. However, if any changes are made in the future in your generation, it is your responsibility to report these changes to this office.
3. A Generator Fee was added to the amended Hazardous Waste Law of 1980. This change in the law requires generators who produce over 10 tons of hazardous waste per year to pay an annual fee. Applicable firms may find that the re-registration process will provide a more accurate calculation of the generator fee. If information the department has on file indicates your firm produces over 10 tons per year, you will find generator fee forms enclosed.
4. Confidential information is to be requested in writing. Under the Hazardous Waste Management Law as amended in 1980, confidential treatment can only be granted by the department if the generator provides a written justification for it. Many generators are still claiming confidentiality under the original law and as marked on the original waste registration forms. Re-registration will provide generators the opportunity to claim information confidential if they have not already done so.

Therefore, we are requesting that all generators of hazardous waste complete the enclosed forms (DNR HWG-1 and DNR HWG-1A) and return them within

Christopher S. Bond Governor
Fred A. Lafser Director

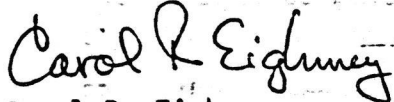
Division of Environmental Quality
Robert J. Schreiber Jr., P.E. Director

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Page Two

thirty days. In addition, any generator producing more than ten tons/year of hazardous waste must complete form HWG-6. Should you have questions about the forms, please contact Joe Davis or Ken Purvis at 314-751-3241. Thank you for your cooperation.

Sincerely,



Carol R. Eighmey
Chief
Planning & Management Section
Waste Management Program

CRE:dsr

Enclosures

FORM HWG-1)

FOR

GENERATOR I.D. 01089 GENERATOR NAME TALBOT GENERAL WIRE PRODUCTS INC
PLANT LOCATION 1211 HARMONY ST
MAILING ADDRESS 1211 HARMONY ST
CITY, STATE, ZIP NEOSHO MO 64850
NO. EMPLOYEES AT SITE 00200 COUNTY 145 NEWTON
INDUSTRIAL CLASSIFICATION NUMBERS 3496
DUN/BRADSTREET NUMBER 000007140874 I.R.S. EMPLOYER I.D. NO. 440660652

(HWG-1A) HAZARDOUS WASTE INFORMATION FOR WASTE NUMBER (001)
DNR HAZARD CLASS 1. TOXIC 2. REACTIVE 3. IGNITABLE 4. X CORROSIVE
5. BIOALLUMULATIVE, TERATOGENIC, CARCINOGENIC, MUTAGENIC OR OTHER
MONTHLY GENERATION RATE 15,000 GALS = 56,7750 KKG
WASTE DESC. 3496 FABRICATED WIRE PRODUCTS, MISCELLANEOUS
HAZARDOUS TYPE 01. ACIDS
TYPE OF VEHICLE A. TRACTOR-TRAILER B. ROLL-OFF/LUGGER C. DUMP TRUCK
D. FLATBED E. X TANK TRUCK F. OTHER
RECOMMENDED DISPOSAL OR TREATMENT A. INCINERATION B. TREATMENT
NUMBER SHIPMENTS PER-MO. 006 C. LAND DISPOSAL D. RESOURCE RECOVERY

TOTAL ESTIMATED WASTE PER-YR 681.3000 KKG

TOTAL PER-YR

0 TONS 23,220,000 GALS 0 LBS 0 CUBIC-YRDS

K062

Every Weld, Guaranteed



TALBOT Industries, Inc.

1211 Harmony St., P.O. Box 608, Neosho, Missouri 64850, 417-451-5900

December 9, 1982

Carol R. Eighmey, Chief
Planning & Management Section
Waste Management Program
Missouri Department of Natural Resources
P.O. Box 1368
Jefferson, City, MO 65102

Gentlemen:

In reply to your request for information related to our registration as a hazardous waste generator, may we advise you as follows:

We have recently changed our processes so that we mix our corrosive wastes with our alkaline rinse water in proportions to control the PH and contents of our waste water to a level acceptable to the city.

We are no longer shipping or storing corrosive waste at our plant.

Following an inspection November 18, 1982, by Burt McCullough of your Springfield Regional Office, we were advised by him that we will no longer be considered hazardous waste generators. He said he would follow through with his recommendation in a report to Jefferson City.

For these reasons we ask to be removed from the list of hazardous waste generators.

Yours truly,

F.A. Bourne
Vice President - Engineering
Talbot Industries, Inc.
(Formerly Talbot-General Wire
Products, Inc.)

12/16/82

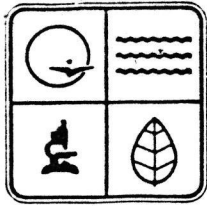
REQUEST / TELCON SANDRA CARROLL
FURNISH COPY OF BEDAN
LETTER & McCULLOUGH REPORT
FAB:mc

TO ABOVE

Enclosure - M.D.N.R. Form HWG-1

cc: Frank Dolan MDNR Jefferson City
Joe Jansen - " " "
Burt McCullough MDNR Springfield
Paul Trentham, Allgeier & Martin
Gene Schwartz, Talbot Industries
Fred Jansen, Talbot Industries

Welded Wire Products - Automatic Commercial Plating - Plastic Coating - Rod Cleaning - Wire Drawing Facilities



RECEIVED DEC 16 1982

December 9, 1982

Mr. Alex Bourne
Talbot General Wire Products, Inc.
1211 Harmony Street
Neosho, Missouri 64850

Dear Mr. Bourne:

Enclosed please find a copy of the Resource Conservation and Recovery Act Compliance Inspection Report for your facility. I believe it is self-explanatory.

If you have any questions or if we can be of assistance to you, don't hesitate to contact either the regional office or Ms. Sandra Carroll of this office.

Sincerely,

David E. Bedan, Ph.D.
Director
Waste Management Program

DEB:SC:dsr

Enclosure

cc: Springfield Regional Office
Mr. David Doyle, EPA Region VII Enforcement Branch

324 E 11 TH ST

KE MO 64106

TELECON SANDRA CARROLL 12/16/82

CE GENE
FRED

Christopher S. Bond Governor
Fred A. Lafser Director

Division of Environmental Quality
Robert J. Schreiber Jr., P.E. Director

MISSOURI DEPARTMENT OF NATURAL RESOURCES
P.O. Box 1368 1915 Southridge Drive Jefferson City, Missouri 65102 (314) 751-3241

HAZARDOUS WASTE COMPLIANCE INSPECTION

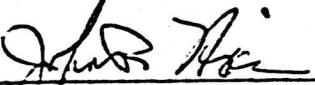
Talbot General Wire Products, Inc.
1211 Harmony Street
Neosho, MO 64850
(417) 451-5900
MDNR #01089
EPA ID #MOD007140874
Contact: Mr. Alex Bourne, Vice President - Engineering

On November 18, 1982, Burt McCullough, Missouri Department of Natural Resources, Springfield Regional Office, conducted a hazardous waste compliance inspection at Talbot General Wire Products, Inc., at Neosho in Newton County, Missouri. Talbot manufactures miscellaneous wire products such as barbecue grills, etc. Included in the manufacturing process is a chromium plating operation. Talbot has developed a sophisticated chrome recovery process with which no hazardous wastes are generated by their plating operations. The only hazardous waste which has been generated by Talbot is spent pickle liquor from wire cleaning operations. In the past this spent pickle liquor was shipped to Oklahoma for deep-well injection. More recently, it has been found that the iron sulfate in the pickle liquor can enhance flocculation at the Neosho sewage treatment plant. After considerable study, Talbot constructed a chemical sewer to introduce the spent pickle liquor to the POTW. It appears that the pickle liquor is not causing any problems to the POTW. No other hazardous wastes are generated at Talbot.

RECOMMENDATIONS:

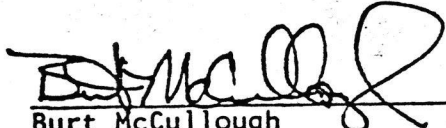
- 1) Since no hazardous wastes are being generated at Talbot for disposal any longer, Talbot General Wire Products, Inc., should petition the U.S. Environmental Protection Agency and the Missouri Department of Natural Resources to be removed from the hazardous waste system.

APPROVED BY:



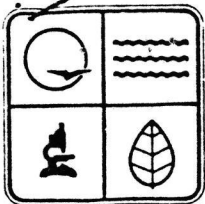
John R. Nixon, P.E.
Administrator

SUBMITTED BY:



Burt McCullough
Environmental Specialist

January 26, 1983



RECEIVED FEB 21 1983

RE: Hazardous Waste Generator Fee

Dear Hazardous Waste Generator:

On December 1, 1982, the Waste Management Program of the Department of Natural Resources sent your company a letter notifying you that our records show that you are a hazardous waste generator. As of this date, the Department has not received a response from your firm concerning the hazardous waste generator fee. This fee is set forth in Section 260.380(10) [Supp. RSMo. 1980] of the Missouri Hazardous Waste Management Law and is implemented by 10 CSR 25-5.020 of the Missouri Hazardous Waste Management Regulations.

If a fee is applicable, please make the certified check or money order payable to the Division of Taxation, Department of Revenue and send the enclosed Form 6 to the following address:

Division of Taxation
Missouri Department of Revenue
P. O. Box 3200
Jefferson City, Missouri 65102

The Department needs your response even if the fee is not applicable to your firm. The situations which may exempt your firm from this fee would be if it generates less than 10 metric tons of hazardous waste per year, the waste is going to a certified or approved resource recovery facility, or the waste is being legally discharged by way of a sewer to a municipally owned wastewater treatment plant. We would appreciate your response as soon as possible.

If there are questions concerning the above, please feel free to contact Joe Davis or Ken Purvis of my staff at (314) 751-3241.

Sincerely,

David E. Bedan, Ph.D.
Director
Waste Management Program

DEB:KJD:dsr

Enclosures

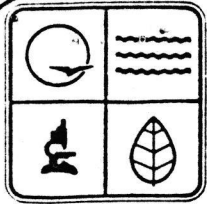
cc: Mr. Wrenn Mullendore, Chairman, Hazardous Waste Management Commission
Mr. Bob Schreiber
Mr. Ed Downey
Mr. Asim Khawaja

Christopher S. Bond Governor
Fred A. Lafser Director

Division of Environmental Quality
Robert J. Schreiber Jr., P.E. Director

TECCOU Joe DAVIS 2-7-83

MISSOURI DEPARTMENT OF NATURAL RESOURCES
P.O. Box 1368 1915 Southridge Drive Jefferson City, Missouri 65102 (314) 751-3241



CERTIFIED MAIL - P215289286

March 11, 1983

RECEIVED MAR 16 1983

Dear Hazardous Waste Generator:

You have received two notifications from the Missouri Department of Natural Resources, dated November 30, 1982 and January 28, 1983, stating that you must pay a fee because you are a generator of hazardous waste. The Department of Natural Resources has not received your fee nor any response from you.

If you do not respond to the Department of Natural Resources within ten (10) days of the date of this letter, enforcement proceedings will be initiated by the Department against you. You may respond by (1) payment in full of the generator fee or (2) a response in writing to the Department stating that your business is exempt and verification of that exempt status request. The Department needs your response even if the fee is not applicable to your firm. With your response you should enclosed the completed form DNR-H.W.G.-6.

Sincerely,

Treva J. Hearne
Counsel
Department of Natural Resources

TJH:jdd

cc: Waste Management Program
Attorney General's Office

MISSOURI DEPARTMENT OF NATURAL RESOURCES
P.O. Box 1368 1915 Southridge Drive Jefferson City, Missouri 65102 (314) 751-3241

TELCON WILSON ABOVE OFFICE 3-17-83

Christopher S. Bond Governor
Fred A. Lafser Director

Division of Environmental Quality
Robert J. Schreiber Jr., P.E. Director